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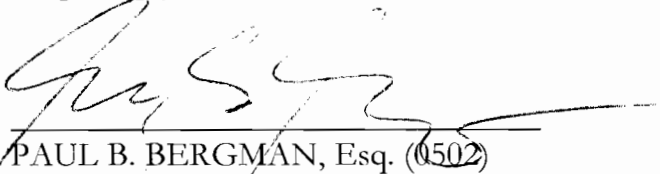
**X**

PLLG. FILED COURT  
OCT 05 2007  
S. D. OF N.Y.

in connection with the representation of Brian Vaughn. Robert G. Anderson is a member in good standing of the Mississippi Bar. There are no pending disciplinary proceedings against Robert G. Anderson in any State or Federal court.

Dated: October 3, 2007  
New York, New York

Respectfully submitted,



PAUL B. BERGMAN, Esq. (0502)

950 Third Avenue  
New York, NY 10022  
Tel. No.: 212-355-7711  
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E-mail: [berglaw@mindspring.com](mailto:berglaw@mindspring.com)

TO: Clerk of the Court  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Deborah E. Landis, Esq.  
Assistant U.S. Attorneys  
Southern District of New York  
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Paula M. Junghans, Esq.  
Zuckerman Spaeder, L.L.P.  
1800 M Street, N.W. Suite 1000  
Washington, D.C. 20036

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- V. -

ROBERT COPLAN,  
MARTIN NISSENBAUM,  
RICHARD SHAPIRO, and  
BRIAN VAUGHN,

Defendants.

AFFIDAVIT OF PAUL B. BERGMAN  
 IN SUPPORT OF MOTION FOR  
 ADMISSION OF ROBERT G.  
 ANDERSON PRO HAC VICE  
 07 Cr. 453 (SHS)

[illegible]

PAUL B. BERGMAN, being duly sworn, hereby deposes and says as follows:

1. I am local counsel for Brian Vaughn, a defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this affidavit in support of the within motion to admit Robert G. Anderson as counsel *pro hac vice* to represent Brian Vaughn in this matter. Except where the context shows otherwise, this affidavit is made upon information and belief.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in March, 1968. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Robert G. Anderson is of counsel to Butler, Snow, O'Mara, Stevens & Cannada, PLLC, in Jackson, Mississippi.

4. Mr. Anderson served as an Assistant United States Attorney in the Southern District of Mississippi for 13 years. During his tenure there, Mr. Anderson served as the Chief of the Civil Division, Money Laundering Crimes Coordinator, and Health Care Prosecutor. Mr. Anderson was awarded the HHS Inspector General's Integrity Award in 1997 and 2005. Mr. Anderson is an Adjunct Professor at Mississippi College School of Law, teaching healthcare law.

5. I believe these impressive credentials demonstrate that Mr. Anderson is a person of integrity and a skilled attorney, experienced in Federal Practice and familiar with the Federal Rules of Criminal Procedure and the Federal Rules of Evidence. A certified copy of Mr. Anderson's current Certificate of Good Standing from the Supreme Court of Mississippi is annexed hereto as Exhibit A.

6. Accordingly, I am pleased to move the admission of Robert G. Anderson, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Robert G. Anderson, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Robert G. Anderson, *pro hac vice* to represent Brian Vaughn in the above captioned matter, be granted.

Sworn to before me this  
3rd day of October, 2007

  
NOTARY PUBLIC

MARK L. FREYBERG  
NOTARY PUBLIC, State of New York  
No. 31-4878056  
Qualified in New York County  
Commission Expires November 3, 2010

  
PAUL B. BERGMAN

# ***The Supreme Court of Mississippi***



## ***Certificate of Good Standing***

*I, Betty W. Sephton, as Clerk of the Supreme Court of Mississippi, do hereby certify that **Robert Gilmon Anderson** was duly and legally admitted to practice law before the Supreme Court of Mississippi on April 28, 1988, and is now an attorney in good standing of the Bar of this Court, as shown by the records of said Court on file in this office.*

*I further certify that the Supreme Court of Mississippi is the highest court of record in this state.*

*Done on October 1, 2007, with the seal of the Supreme Court of Mississippi affixed.*

**The Supreme Court of Mississippi**

  
CLERK

CERTIFICATE OF SERVICE

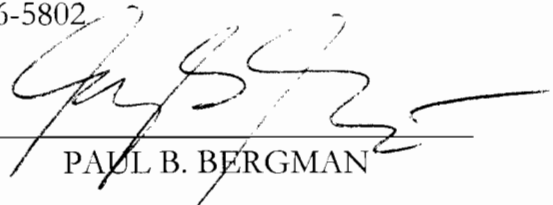
I, Paul B. Bergman, local counsel for Brian Vaughn, do hereby certify that on October 3, 2007, I caused to be served a copy of the within Motion for Admission of Robert G. Anderson *Pro Hac Vice* on the following attorneys by first class mail addressed as follows:

Deborah E. Landis, Esq.  
U.S. Attorney's Office, SDNY  
One St. Andrew's Plaza  
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PAUL B. BERGMAN